

Jason Crews
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In propria persona

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION

Jason Crews,

Plaintiff,

v.

Tanpri Media & Arts, Inc, *et al.*

Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of Plaintiff's

Fourth *Ex Parte* Application for Subpoenas

Duces Tecum

Pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 45, 69, and General Order 18-19 ("Order"), Judgment Creditor Jason Crews ("Crews") respectfully moves the court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors. In support thereof, Plaintiff states as follows.

On March 27, 2024, this court entered a default judgement in Crews' favor. FRCP Rule 69 states "In aid of the judgment or execution, the judgment creditor or a successor in interest whose interest appears of record may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located."

JPMorgan Chase Bank, N.A.

JPMorgan Chase, N.A. ("Chase") maintains an office at 802 N Gilbert Rd, Gilbert, AZ 85234, <https://maps.app.goo.gl/NpK2hb7d7fyvt2CRA>, which is approximately 0.9

1 miles away from Crew's address 1515 N Gilbert Rd, Gilbert AZ 85234 and less than 100
2 miles complaint with rule 45(c)(2)(A).

3 Matthew Capozzoli ("Capozzoli")

4 Per discovery responses from PayPal, Inc Capozzoli may have assets currently in the
5 custody of Chase. As such, Crews seeks the following from Chase.

6 (A) All documents pertaining to any checking accounts, open or closed, held by
7 or under the signatory authority of Defendant, Matthew
8 Capozzoli bearing social security number [redacted] from December 9, 2022 to
9 present;

10 (B) All documents pertaining to any savings accounts, open or closed, held by or
11 under the signatory authority of Defendant, Matthew Capozzoli bearing social
12 security number [redacted] from December 9, 2022 to present;

13 (C) All documents pertaining to any credit card accounts, open or closed, held by
14 or under the signatory authority of Defendant, Matthew
15 Capozzoli bearing social security number [redacted] from December 9, 2022 to
16 present;

17 (D) All documents pertaining to any open or closed bank loan documents, reflecting
18 loans made to or co-signed by Defendant, Matthew Capozzoli bearing social security
19 number [redacted] from December 9, 2022 to present;

20 (E) All documents pertaining to any open or closed investment or security custodian
21 accounts, IRA, Keogh, or other retirement plans in the name of or for the benefit of
22 the Defendant, Matthew Capozzoli bearing social security number [redacted] from
23 December 9, 2022 to present;

24 (F) All documents pertaining to Certificates of Deposit purchased or redeemed by the
25 Defendant, Matthew Capozzoli bearing social security number [redacted] from
26 January 1, 2018 to present;

27 (G) Customer correspondence files for Defendant, Matthew Capozzoli bearing social
28 security number [redacted] from December 9, 2022 to present.

(H) All documents pertaining to cashier's, manager's, or bank checks, traveler's
checks, or money orders purchased or negotiated by Defendant, Matthew Capozzoli
bearing social security number [redacted] from December 9, 2022 to present.

(I) All documents pertaining to wire transfers sent or received by Defendant,
December 9, 2022 bearing social security number [redacted] from December 9, 2022
to present, including but not limited to the source

of funds being transferred and/or the destination or recipient of transfer;

(J) All records of any and all safe deposit boxes, open or closed, held by or under the
signatory authority of Defendant, Matthew Capozzoli bearing social security number
[redacted] from December 9, 2022 to present;

1 (K)Teller tapes reflecting all transactions between the Bank and Defendant, Matthew
2 Capozzoli bearing social security number [redacted] from December 9, 2022 to
3 present;

4 Dated this June 1, 2024.

5
6 /s/ Jason Crews

7 Jason Crews
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